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Attorneys for Defendant

7 COMMONWEALTH LAND TITLE INSURANCE  
8 COMPANY

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11  
12 WELLS FARGO BANK, N.A.  
13 SUCCESSOR BY MERGER TO WELSS  
14 FARGO BANK MINNESOTA, N.A.,  
15 F/K/A NORWEST BANK MINNESOTA,  
16 N.A., SOLEY AS TRUSTEE FOR  
17 STRUCTURED ASSET MORTGAGE  
18 INVESTMENTS II INC. BEAR STEARNS  
19 MORTGAGE FUNDING TRUST 2007-  
20 ARI, MORTGAGE PASS-THROUGH  
21 CERTIFICATES, SERIES 2007-ARI,

22 Plaintiffs,

23 vs.

24 COMMONWEALTH LAND TITLE  
25 INSURANCE COMPANY,

26 Defendant.  
27

Case No.: 218-cv-00494-APG-PAL

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
COMMONWEALTH LAND TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO FIRST AMENDED  
COMPLAINT**

**[FIRST REQUEST REGARDING  
FIRST AMENDED COMPLAINT]**



1 Plaintiff Wells Fargo Bank, N.A. Successor By Merger To Wells Fargo Bank Minnesota,  
2 N.A., f/k/a Norwest Bank Minnesota, N.A., Solely As Trustee For Structured Asset Mortgage  
3 Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-Through  
4 Certificates, Series 2007-AR1 ("Wells Fargo"), and Defendant Commonwealth Land Title  
5 Insurance Company, ("Commonwealth"), by and through their counsel of record, hereby stipulate  
6 as follows:

7 **WHEREAS**, Wells Fargo filed its original Complaint in this matter on March 20, 2018  
8 [ECF No. 1];

9 **WHEREAS**, the parties stipulated to extend Commonwealth's time to respond to the  
10 original Complaint to May 7, 2018 [ECF No. 9];

11 **WHEREAS**, on May 7, 2018, Commonwealth filed a Motion to Dismiss Wells Fargo's  
12 original Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure [ECF No. 10];

13 **WHEREAS**, the parties stipulated to extend Wells Fargo's time to respond to  
14 Commonwealth's Motion to Dismiss to May 29, 2018 [ECF No. 15];

15 **WHEREAS**, on May 29, 2018, Wells Fargo filed a First Amended Complaint in this matter  
16 [ECF No. 16];

17 **WHEREAS**, on June 1, 2018, the Court entered an Order denying Commonwealth's  
18 Motion to Dismiss the original Complaint as moot [ECF No. 17];

19 **WHEREAS**, Commonwealth's response to the First Amended Complaint is currently due  
20 on June 12, 2018;

21 **WHEREAS**, Wells Fargo has agreed (1) to extend Commonwealth's time to respond to the  
22 First Amended Complaint to June 19, 2018, and (2) if Commonwealth files a Motion to Dismiss  
23 the First Amended Complaint on or before that date, to extend Commonwealth's deadline to file an  
24 Answer to the First Amended Complaint until 14 days after the Court rules on Commonwealth's  
25 Motion to Dismiss the First Amended Complaint;

26 Now, therefore, the parties hereto, by and through their counsel of record, and subject to  
27 Court approval, hereby stipulate and agree as follows:

- 1 1. Commonwealth shall file its response to Wells Fargo's First Amended Complaint in this  
2 matter on or before June 19, 2018; and  
3 2. If Commonwealth files a Motion to Dismiss the First Amended Complaint,  
4 Commonwealth shall file an Answer to the First Amended Complaint within fourteen  
5 days of the Court's ruling on the Motion to Dismiss.  
6

7 Dated this 7th day of June 2018

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

9 By: /s/ Kevin S. Sinclair

10 Kevin S. Sinclair  
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601 South Seventh Street, 2<sup>nd</sup> Floor  
Las Vegas, Nevada 89101

12 Attorneys for Defendant  
13 Commonwealth Land Title Insurance Company

14 Dated this 7th day of June 2018

WRIGHT, FINLAY & ZAK, LLP

15 By: /s/ Edgar C. Smith

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20 Attorneys for Plaintiff  
21 Wells Fargo Bank, N.A. Successor By Merger to  
22 Wells Fargo Bank Minnesota, N.A., Solely As  
Trustee For Structured Asset Mortgage  
23 Investments II Inc. Bear Stearns Mortgage Funding  
Trust 2007-ARI, Mortgage Pass-Through Certificates,  
Series 2007-ARI

24 **IT IS SO ORDERED:**

25   
26 By: J. A. Feen  
UNITED STATES MAGISTRATE JUDGE

27 Dated: June 12, 2018